

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC., et al.

Defendants.

No. 6:12-cv-022-MHS-CMC

JURY TRIAL DEMANDED

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC., et al.

Defendants.

No. 6:12-cv-122-MHS-CMC

JURY TRIAL DEMANDED

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC., et al.

Defendants.

No. 6:12-cv-123-MHS-CMC

JURY TRIAL DEMANDED

**DEFENDANTS' REPLY BRIEF IN SUPPORT OF THEIR MOTION FOR PARTIAL
SUMMARY JUDGMENT
OF INVALIDITY OF CLAIM 13 OF THE '808 PATENT**

Adaptix conceded in its Opposition that “[i]n view of the Court’s construction of the claim term ‘broadband spatial signature vectors’ as ‘2-D spatial signature vectors,’ ADAPTIX does not oppose the present motion.” *See* Opp. at 1. Therefore, Defendants’ respectfully request that the Court grant their Motion for Partial Summary Judgment of Invalidity of Claim 13 of the ‘808 Patent.

Respectfully submitted,

Dated: December 15, 2014

By: /s/ Stephen A. Swedlow

David A. Nelson
Stephen A. Swedlow (pro hac vice)
Brianne M. Straka (pro hac vice)
Marc L. Kaplan (pro hac vice)
Lauren Hillemann (pro hac vice)
Quinn Emanuel Urquhart & Sullivan LLP
500 W. Madison St.
Suite 2450
Chicago, IL 60661
Tel: (312) 705-7400

Michael E. Jones (SBN 10929400)
Allen F. Gardner (SBN 24043679)
POTTER MINTON, P.C.
110 N. College, Suite 500
Tyler, Texas 75702

*Attorneys for Defendants Alcatel-Lucent
USA, Inc. and AT&T Mobility LLC*

By: /s/ Geoffrey M. Godfrey

Mark D. Flanagan (pro hac vice)
Robert M. Galvin (pro hac vice)
Geoffrey M. Godfrey (pro hac vice)
Cortney C. Hoecherl (pro hac vice)
S. Dennis Wang (pro hac vice)
Wilmer Cutler Pickering
Hale and Dorr LLP
950 Page Mill Road
Palo Alto, CA 94304
Tel: (650) 858-6000
Fax: (650) 858-6100

Michael E. Jones (SBN 10929400)
Allen F. Gardner (SBN 24043679)
POTTER MINTON, P.C.
110 N. College, Suite 500
Tyler, Texas 75702
Tele: (903) 597-8311
Fax: (903) 593-0846
mikejones@potterminton.com
allengardner@potterminton.com

*Attorneys for Defendants Cellco Partnership
d/b/a Verizon Wireless*

By: /s/ Mark W. McGrory
Mark W. McGrory (*pro hac vice*)
Lawrence A. Rouse (*pro hac vice*)
ROUSE HENDRICKS GERMAN MAY PC
1201 Walnut, 20th Floor
Kansas City, MO 64106
Tel: (816) 471-7700
Fax: (816) 471-2221
MarkM@rhgm.com
LarryR@rhgm.com

Michael E. Jones (SBN 10929400)
Allen F. Gardner (SBN 24043679)
POTTER MINTON, P.C.
110 N. College, Suite 500
Tyler, Texas 75702
Tele: (903) 597-8311
Fax: (903) 593-0846
mikejones@potterminton.com
allengardner@potterminton.com

Attorneys for Defendant Sprint Spectrum L.P

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was filed electronically on December 15, 2014 in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service per Local Rule CV-5(b)(1).

/s/ Stephen A. Swedlow
Stephen A. Swedlow